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January 22, 2020

**VIA ECF**

Hon. Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Re: *Bromfield-Thompson v. American University of Antigua, et al.*,  
Civil Action No. 19-CV-6078 (JMF) (S.D.N.Y.)

Dear Judge Furman:

This firm is counsel to American University of Antigua (“AUA”) and Manipal Education Americas, LLC (“MEA”) in the above-referenced matter. I am writing to request the Court’s permission to file a memorandum of law in support of AUA’s and MEA’s upcoming joint motion to dismiss the First Amended Complaint that exceeds the 25-page limitation on memoranda.

AUA and MEA are required to answer or move to dismiss the First Amended Complaint in this action by February 4, 2020. Both parties intend to seek dismissal of the complaint. Although AUA and MEA have some arguments that are common to both, their grounds for seeking dismissal do not overlap completely. As we did when we filed defendants’ earlier motion to dismiss, we would prefer to file a single memorandum to avoid duplication of similar arguments, but are unable to do so within the 25-page limitation under Your Honor’s Individual Rules. Accordingly, we respectfully request that the Court permit us to file a joint memorandum of law on behalf of AUA and MEA consisting of up to 40 pages.

Respectfully submitted,

/s/ Robb W. Patryk

Robb W. Patryk

cc: All Counsel of Record (via ECF)